

**Rocky Flats Citizens Advisory Board
Recommendation 96-9
to the U.S. Department of Energy**

**Regarding the Draft Programmatic Environmental Impact Statement
on the Storage and Disposition of Weapons-Usable Fissile Materials**

Approved May 2, 1996

General:

- DOE should reduce transport of fissile materials to a minimum, thus protecting the health and safety of workers and the public, and the integrity of the environment along the transportation corridors.
- DOE should reduce the current and future risk of nuclear proliferation. Furthermore, the U.S. should promote international inspection of both non-surplus and surplus Pu and HEU, thus implementing U.S. non-proliferation policy in a way that positively involves other countries.
- All activities associated with weapons-usable fissile materials should be subject to external, independent regulation, as recommended in December 1995 by DOE's Advisory Committee on External Regulation of Nuclear Safety. Having external regulation should help assure availability of funding.
- DOE should provide for full public participation in all decisions regarding the storage and disposition of weapons-usable fissile materials.
- Any options that DOE selects should protect the health and safety of the public and the workers, assure the integrity of the environment, and protect

Any Processing at Rocky Flats Should:

- Reduce or eliminate the necessity for any future processing or handling at Rocky Flats or at another site.
- Make the Pu as proliferation-resistant as possible.
- Put the Pu in a form suitable for disposition.

ADMIN RECORD

Surplus Plutonium:

- Should be regarded as a proliferation liability.

Storage:

- All storage options should result in proliferation-resistant material.
- DOE should consider other Pu storage containers besides the 50-year can.

Disposition:

- DOE should promote and support a national and international dialogue on disposition of surplus fissile materials. To be successful, disposition must be a multi-national effort.
- DOE should release all cost study information for the MOX fuel option in time for public review and comment before release of the final PEIS.
- DOE should further research the deep borehole technology, and focus on environmental, safety, and health uncertainties.
- DOE should analyze other technologies.

Processing:

- DOE should reduce processing and handling of fissile materials to the absolute minimum, thus protecting the health and safety of workers and the public, as well as the integrity of the environment at sites where processing, storage, or disposition work occurs.
- Processing should put the Pu in a form suitable for disposition.
- Immobilizing Pu seems the best option for storage, but DOE should further analyze immobilization technologies to ensure proliferation-resistant material.
- DOE should consider vitrification and ceramification as the preferred options, and it should determine their comparative merits for putting Pu in proliferation-resistant, disposition-ready form.
- DOE should develop small-scale vitrification or ceramification pilot plants in as many sites as necessary to prove the technology, so as to determine whether stabilization and immobilization can be accomplished in a single step.

QUESTIONS REGARDING INFORMATION ON ROCKY FLATS

1. Table 4.2.7.9-1, note b, on page 4-341 states that the "annual natural background radiation level at RFETS is 353 mrem for the average individual." Since we no longer live in an environment of "natural background radiation level," shouldn't this note refer instead to the "average annual background radiation level" resulting from natural background plus fallout from atmospheric nuclear explosions? Accordingly, the line in the table referring to "percent of natural background" should also be corrected. Finally, the text needs to provide a source for the 353 mrem figure.

2. Table 4.2.7.9-2 on page 4-342 gives numbers for "50-year fatal cancers" in the Rocky Flats workforce. The space for this category under workers "involved" in Pu operations is blank, the space under workers "not involved" is 15. Then the table gives a total for all workers of 16 50-year fatal cancers. How can this be? Is it true that more-exposed workers experience only a single fatality while those less exposed experience 15?

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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